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ORIGINAL

Of Counsel:

CLAY CHAPMAN CRUMPTON IWAMURA & PULICE

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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

MAR 24 2006

at 1 o'clock and 5 min. M
SUE BEITIA, CLERK

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

GAIL SPICUZZA,

Plaintiff,

vs.

GENERAL STAR INDEMNITY COMPANY,

Defendant.

CV 04-00205 DAE BMK

PLAINTIFF'S DISCLOSURES

PLAINTIFF'S DISCLOSURES

To: KEITH K. HIRAOKA, ESQ.
Roeca, Louie & Hiraoka
900 Davies Pacific Center
841 Bishop Street
Honolulu, Hawaii 96813

Comes now Plaintiff herein, and pursuant to Fed. R. Civ. P. 26 and
the agreement of the parties, makes the following disclosures:

#271507 v1 - Vol. Disc.

(CERTIFICATE OF SERVICE ATTACHED)

A. PERSONS WHO ARE BELIEVED TO HAVE DISCOVERABLE KNOWLEDGE

GAIL SPICUZZA
c/o Clay Chapman Crumpton Iwamura & Pulice

ROY F. HUGHES
Hughes & Taosaka
900 Pauahi Tower
1001 Bishop Street
Honolulu, Hawaii 96813
(808) 526-9744

Coverage Counsel for Plaintiff

JOHN A. BENDER, JR.
HERBERT L. ALBRITTON
D. R. EBEL
K. CADIGAN-MCGEE
LORI E. NIES
AOIFE KINSELLA-BALL
Formerly of Holland & Knight, LLP
2600 Pike Tower
520 Pike Street
Seattle, WA 98101
(206) 340-1825 ext. 271

These witnesses represented Ms. Spicuzza in the NASD arbitration. Mr. Bender also was involved in the tender of the defense to Defendant.

MICHELE K. GERACE
AON Risk Services
current address unknown
(212) 441-1000

Believed to have knowledge regarding Plaintiff's Insurance Coverage

A.R. MERCER
Tope Consulting
P.O. Box 1469
McCleary, WA 98557

(360) 495-4305

Provided Paralegal Services for Plaintiff in NASD arbitration

LINDA L. ARANA
current address unknown

KEITH Y. YAMADA
Cades Schutte LLP
1000 Bishop Street, Suite 1100
Honolulu, HI 96813
(808) 521-9200

Represented Linda Arana.

SAMUEL Y. EDGERTON, III
CHAD WEAVER
Nash & Edgerton
2615 Pacific Coast Hwy., Ste. 322
Hermosa Beach, CA 90254
(310) 937-2066

Represented Linda Arana in the NASD arbitration.

WILLIAM P. TORNGREN
117 J Street, Ste. 300
Sacramento, CA 95814
(916) 554-6447

Represented Linda Arana.

COLLEEN A. SHEA (fka Colleen A. Leech)
Fairfield Insurance Company
550 5. Hope Street, Suite 600
Los Angeles, CA 90071
(213) 630-2498

Ms. Shea was involved in the handling of Ms. Spicuzza's tender of defense.

NICHOLAS J. FANELLI

TED L. GAISFORD
General Star Management Company
550 5. Hope Street, Suite 700
Los Angeles, CA 9007 1-2648
(213) 630-1930

Mr. Fanelli and Mr. Gaisford were involved in the handling of Ms. Spicuzza' s
tender of defense.

ALAN H. BARBANEL
Barbanel & Treuer, P.C.
1925 Century Park East, Ste. 350
Los Angeles, CA 90067
(310) 282-8088

Coverage counsel for General Star.

CAROLYN P. BELL
8700 Beverly Boulevard, TSB 130
Los Angeles, CA

Coverage counsel for General Star.

AMY L. DANTZLER
728 1/2 South Dunsmuir Avenue
Los Angeles, California 90036

Coverage counsel for General Star.

THOMAS E. GREIFF
Sonnenschein Nath & Rosenthal LLP
601 South Figueroa St., Ste. 1500
Los Angeles, CA 90017
(213) 623-9300

Coverage counsel for General Star.

TRACY WARD DENMAN, CIC
Senior Account Executive
The CIMA COMPANIES, INC.
Insurance Brokers & Agents

216 South Peyton Street
Alexandria, Virginia 22314-2892
(703) 739-9300

Has knowledge about Defendant's response to efforts to obtain copies of additional policies from Defendant

DIANE DAHLE
General Star Management Company
Financial Centre
P.O. Box 10354
Stamford, CT 06904
Tel. (203)328-5530

Has knowledge about Defendant's response to efforts to obtain copies of additional policies from Defendant

LOUISE POWER
Address Unknown
(203) 328-5700

Has knowledge about Defendant's response to efforts to obtain copies of additional policies from Defendant

RONALD K. ALBERTS
VIVIAN A. ALBERTS
Berger, Kahn, Shafon, Moss, Figler, Simon & Gladstone
4215 Glencoe Ave., 2nd Flr.
Marina Del Rey, CA 90292
(310) 821-9000

Represented Pruco Securities Corporation in the NASD arbitration.

MICHAEL M. GLESS
KIMBERLY WONG
Keesal, Young & Logan
400 Oceangate
P.O. Box 1730
Long Beach, CA 90801-1730
(562) 436-2000

Represented Prudential Securities, Inc. in the NASD arbitration.

B. DOCUMENTS

Plaintiff will make available to Defendant for inspection and copying, as under Fed.R.Civ.P. 34, all non-privileged documents, data compilations and tangible things in Plaintiff's possession, custody or control that may be used by Plaintiff (other than solely for impeachment purposes) to support its contentions with respect to any significant factual issue in the case.

C. COMPUTATION OF DAMAGES

1. SPECIAL DAMAGES

Legal Fees Paid re NASD Arbitration	\$ 41,286.99
Legal Fees owing re NASD Arbitration	18,221.78
Costs and expenses incurred re NASD Arbitration (itemized below)	21,085.21
Award	147,689.60
TOTAL SPECIAL DAMAGES	\$438,783.58

Itemized Expenses		
Date	Item	Amount
1/2/01	USDC District Court	\$ 105.00
6/2/01	Fifth Circuit Court	\$ 3.50
5/18/01	Alaska Airlines	\$ 405.28
10/10/01	Post Office	\$ 20.00
10/31/01	Doubletree Hotel	\$ 58.02
11/29/01	Delta Air	\$ 498.30
11/30/01	Cheap Tickets	\$ 7.95
12/14/01	Doubletree Hotel	\$ 94.42
12/15/01	Aloha Air	\$ 376.50

Itemized Expenses		
Date	Item	Amount
1/21/02	Agent Fee	\$ 15.00
1/21/02	Northwest Air	\$ 519.01
1/14/02	Holiday Inns LAX	\$ 8.80
1/18/02	Winners	\$ 50.00
2/9/02	Mokihana Travel Service	\$ 212.00
2/12/02	US Post Office	\$ 15.00
2/7/02	USPS	\$ 52.20
2/7/02	USPS	\$ 12.58
3/2/02	Holiday Inns	\$ 71.50
3/4/02	Holiday Inns LAX	\$ 81.17
3/6/02	Avis Rent-A-Car	\$ 142.86
3/6/02	Holiday Inns LAX AIRP	\$ 353.83
3/7/02	Holiday Inns LAX AIRP	\$ 108.30
7/3/02	Delta	\$ 666.50
7/10/02	United Air	\$ 170.71
11/12/02	Steve Reese, attorney	\$ 100.00
12/7/02	Office Depot	\$ 31.74
10/25/02	Postmaster	\$ 26.00
12/8/02	Expedia Travel	\$ 295.21
12/8/02	Alaska Airlines	\$ 605.00
12/14/02	Kinko's	\$ 107.89
12/15/02	LV Hilton Coffee Shop	\$ 15.82
12/16/02	Gordon Biersch	\$ 21.64
12/16/02	LV Hilton Coffee Shop	\$ 24.66
12/17/02	LV Hilton Coffee Shop	\$ 9.04
12/17/02	LV Hilton Coffee Shop	\$ 12.73
12/18/02	Kinko's	\$ 9.70
12/19/02	Kinko's	\$ 14.07
12/18/02	LV Hilton Coffee Shop	\$ 13.48
12/20/02	LV Hilton Coffee Shop	\$ 19.68
12/21/02	Residence Inns Hughes	\$ 101.89
12/20/02	Residence Inns Hughes	\$ 5.07
12/20/02	LV Hilton Coffee Shop	\$ 15.94
12/20/02	La Salsa Cantina-Bola	\$ 44.38
12/22/02	Office Depot	\$ 120.92
1/10/03	Probate Court	\$ 22.00

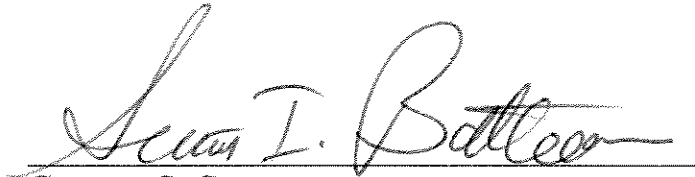
Itemized Expenses		
Date	Item	Amount
2/21/03	Air Courier Assoc	\$ 29.00
2/24/03	Cheap Tickets	\$ 27.00
2/24/03	United Air	\$ 536.90
2/25/03	Hawaiian Air	\$ 541.17
4/2/03	Robert O. Kratovil, attorney	\$ 247.83
4/4/03	Robert O. Kratovil, attorney	\$ 752.17
4/28/03	Gene Barker, court transcript	\$ 60.00
5/14/03	Clerk of the District Court	\$ 150.00
9/3/03	Tope Consulting, paralegals	\$ 10,500.00
10/15/03	Postmaster	\$ 26.00
10/27/03	Kim Otis, court transcript	\$ 234.50
11/17/03	Legal Wings, Inc.	\$ 50.00
1/28/04	Global Express Travel	\$ 20.00
1/28/04	Travel Connection	\$ 477.90
2/11/04	Hawaiian Air	\$ 480.70
2/17/04	UPPS	\$ 4.42
3/11/04	Hawaiian Air	\$ 474.35
5/15/04	Transcript	\$ 50.00
1/1/05	FedEx	\$ 23.70
1/7/05	Aloha Airlines	\$ 148.00
3/21/05	USPS	\$ 4.42
3/21/05	USPO Status Report to Nev	\$ 5.16
4/14/05	UPS Air to Appeals Court	\$ 21.64
4/14/05	USPO Certified to Edgerton	\$ 4.48
4/16/05	USPO to CA Court	\$ 1.98
9/10/05	Copies & Mailed	\$ 73.49
9/26/05	Hawaiian Air	\$ 468.30
10/31/05	USPS	\$ 6.81
TOTAL		\$ 21,085.21

2. General Damages for emotional distress, and the consequences of being forced to defend herself in the arbitration, resulting in an adverse result and the loss of her residence, among other consequences, in an amount to be determined at trial.

3. Punitive Damages in an amount to be determined at trial.
4. Interest, Costs and Attorney's Fees, in an amount to be determined at trial.

All documents supporting the above damage calculations will be made available for inspection.

DATED: Honolulu, Hawaii; March 24, 2006.



GERALD S. CLAY
SCOTT I. BATTERMAN
Attorneys for Plaintiff

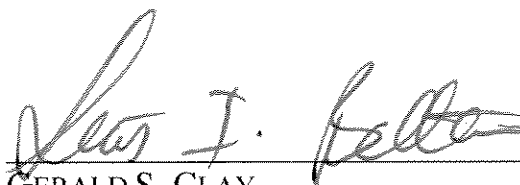
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing PLAINTIFF'S DISCLOSURES was duly served by depositing same in the U.S. Mail, postage prepaid, on March 24, 2006, addressed as follows:

KEITH K. HIRAOKA, ESQ.
Roeca, Louie & Hiraoka
900 Davies Pacific Center
841 Bishop Street
Honolulu, Hawaii 96813

Attorney for Defendant

DATED: Honolulu, Hawaii; March 24, 2006.

A handwritten signature in dark ink, appearing to read "Gerald S. Clay", is written over a horizontal line.

GERALD S. CLAY
SCOTT I. BATTERMAN
Attorneys for Plaintiff